

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

William A. Newsom,  
Plaintiff,

v.

Stanley W. Taylor, et al.,  
Defendant.

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)  
)

Civil Action No. 05-673GMS

PLAINTIFF'S DISCOVERY

Plaintiff requests that the defendants for Delaware Department of Corrections, disclose all initial information and documents the defendants will use to support its defenses, and serve them upon plaintiff within 30 days pursuant to Fed. R. Civ. P. 26(a)(1)

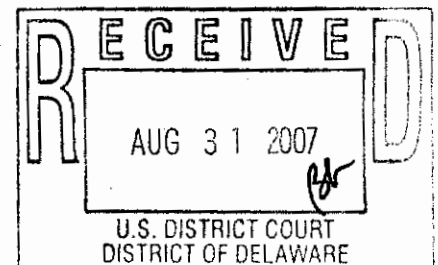
1. A servable address for retired Security Superintendent Cunningham who was employed at the Delaware Correctional Center. This individual was dismissed without prejudice on May 3, 2007. Because he is a Key defendant in plaintiff's case, plaintiff will be amending his complaint to add this individual back on his complaint as a defendant.

2. A servable address for retired Captain Clyde Sagers who was employed at the Delaware Correctional Center. This individual was dismissed without prejudice on May 3, 2007. Because he is a key defendant in plaintiff's case, plaintiff will be amending his complaint to add this individual back on his complaint as a defendnat.

Submitted this 29 day of August, 2007.

*William A. Newsom*

William A. Newsom SBI#257317  
Delaware Correctional Center  
1181 Paddock road  
Smyrna, DE 19977



**Certificate of Service**

I, William A. Newsom hereby certify that I have served a true and correct copy(ies) of the attached Motion for Discovery upon the following parties/persons:

To: Daniel McKenty

1225 N. King St., Suite 1100

P.O. Box 397

Wilmington, De. 19899

To: Eileen Kelly, DAG

Civil Division

820 N. French St.

Wilmington, De. 19801

To: U.S. District Court

844 N. King St.

LockBox 18

Wilmington, De. 19801

To:

To:

To:

BY PLACING IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correction Center, Smyrna, DE 19977.

On this 29<sup>th</sup> day of August, 2007

*William A. Newsom*

William A. Newsom

SBI # 257317

IM WILLIAM A. NEWSON  
SBI# 257317 UNIT T-2  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

UNITED STATES DISTRICT COURT  
844 N. KING ST.  
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WILMINGTON, DELAWARE  
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